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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT
ON STATUS AND RESOLUTION OF
OMNIBUS OBJECTIONS WITH
RESPECT TO CERTAIN CLAIMS**

**[Re: Docket Nos. 9070, 9427, 9455, 9458,
9462, 9464, 9466, 9711, 9891, 9895, 10289,
and 10299]**

**Regarding Objections Set for Hearing
April 28, 2021 at 10:00 a.m. (Pacific Time)**

REPORT ON RESOLUTION OF CERTAIN CLAIMS

In advance of the April 28, 2021, 10:00 a.m. omnibus hearing (the “**Hearing**”), PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby report on the status and resolution of certain Claims in the following omnibus claims objections:

| Docket No. | Omnibus Objection |
|-------------------|---|
| 9070 | <i>Reorganized Debtors’ Fourteenth Omnibus Objection to Claims (Books and Records Claims) (the “Fourteenth Omnibus Objection”)</i> |
| 9427 | <i>Reorganized Debtors’ Twenty-Eighth Omnibus Objection to Claims (Books and Records Claims) (the “Twenty-Eighth Omnibus Objection”)</i> |
| 9455 | <i>Reorganized Debtors’ Fortieth Omnibus Objection to Claims (No Liability / Passthrough Claims) (the “Fortieth Omnibus Objection”)</i> |
| 9458 | <i>Reorganized Debtors’ Forty-First Omnibus Objection to Claims (No Liability / Passthrough Claims) (the “Forty-First Omnibus Objection”)</i> |
| 9462 | <i>Reorganized Debtors’ Forty-Third Omnibus Objection to Claims (No Liability / Passthrough Claims) (the “Forty-Third Omnibus Objection”)</i> |
| 9464 | <i>Reorganized Debtors’ Forty-Fourth Omnibus Objection to Claims (No Liability / Passthrough Claims) (the “Forty-Fourth Omnibus Objection”)</i> |
| 9466 | <i>Reorganized Debtors’ Forty-Fifth Omnibus Objection to Claims (Reduced and Allowed Claims)(the “Forty-Fifth Omnibus Objection”)</i> |
| 9711 | <i>Reorganized Debtors’ Forty-Ninth Omnibus Objection to Claims (Untimely No Liability / Passthrough Claims) (the “Forty-Ninth Omnibus Objection”)</i> |
| 9891 | <i>Reorganized Debtors’ Fifty-Second Omnibus Objection to Claims (No Liability / Passthrough EGI Claims) (the “Fifty-Second Omnibus Objection”)</i> |
| 9895 | <i>Reorganized Debtors’ Fifty-Third Omnibus Objection to Claims (No Liability Subcontractor Claims) (the “Fifty-Third Omnibus Objection”)</i> |
| 10289 | <i>Reorganized Debtors’ Sixty-Third Omnibus Objection to Claims (Satisfied Claims) (the “Sixty-Third Omnibus Objection”)</i> |
| 10299 | <i>Reorganized Debtors’ Sixty-Sixth Omnibus Objection to Claims (ADR No Liability Claims) (the “Sixty-Sixth Omnibus Objection”)</i> |

| Docket No. | Claimant | Claim No. | Resolution |
|--|---|-----------|--|
| Fourteenth Omnibus Objection | | | |
| Informal | Little Diversified Architectural Consulting, Inc. | 8630 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Fourteenth Omnibus Objection. |
| Twenty-Eighth Omnibus Objection | | | |
| Informal | Lloyd's Register Quality Assurance, Inc. | 9488 | The Twenty-Eighth Omnibus Objection is WITHDRAWN with respect to this Claim. It will be allowed as filed. |
| Fortieth Omnibus Objection | | | |
| 9617 | EBEN 818 LLC | 3922 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Fortieth Omnibus Objection. |
| 9646 | Todd Greenberg | 77335 | The Reorganized Debtors have agreed with Claimant to a schedule for resolution of the Claim. <i>See</i> Docket No. 10566. Accordingly, the Hearing with respect to this Claim is taken off calendar. |
| 9647 | Alan Giberson | 8169 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Fortieth Omnibus Objection. |
| 9650 | Andrew Etringer | 91 | The Fortieth Omnibus Objection is WITHDRAWN with respect to this Claim. It will be allowed as filed. |
| 9664 | Martha Gerstner | 3524 | The Reorganized Debtors have sent settlement agreements to the Claimant on April 8, 2021 and April 19, 2021. No response has been received to date. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to May 11, 2021 at 10:00 a.m. |
| 9666 | D.A. Wood Construction Inc. | 8627 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Fortieth Omnibus Objection. |
| 9668 | Frank Klassen | 4389 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Fortieth Omnibus Objection. |

| Docket No. | Claimant | Claim No. | Resolution |
|---------------------------------------|--------------------------------|-----------|--|
| Forty-First Omnibus Objection | | | |
| Informal | Deborah J. & Norman R. Astrin | 96351 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-First Omnibus Objection. |
| Forty-Third Omnibus Objection | | | |
| Informal | Roger Drummond | 1455 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Third Omnibus Objection. |
| 9628 9629 | Rhonda A. Weiss | 72 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Third Omnibus Objection. |
| 9641 | Steven J. McDonald | 80425 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Third Omnibus Objection. |
| Forty-Fourth Omnibus Objection | | | |
| 9637 | Richard S. Tanner | 30916 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Fourth Omnibus Objection. |
| 9642 9654 | John A. Vos | 62490 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Fourth Omnibus Objection. |
| 9672 | Robert B. Wister | 8671 | The Reorganized Debtors sent settlement agreements to the Claimant on March 1, 2021 and April 6, 2021 and have not received a response to date. The Reorganized Debtors wish to resolve and pay the Claim, but, given its unliquidated nature, cannot do so without an order of the Court fixing the amount. The Reorganized Debtors propose allowing the Claim as set forth in the Proposed Order attached hereto as <u>Exhibit A</u> . The Reorganized Debtors are prepared to address any questions from the Court or from Claimant regarding this proposed resolution at the Hearing. |
| Forty-Fifth Omnibus Objection | | | |
| 9619 | Shou Kun Huang and Henry Huang | 7920 | The Reorganized Debtors have sent settlement agreements to the Claimants on March 1, 2021, April 6, 2021, and April 19, 2021, and followed up by telephone today. No response has been received to |

| Docket No. | Claimant | Claim No. | Resolution |
|---------------------------------------|-------------------------------|-----------|---|
| | | | date. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to May 11, 2021 at 10:00 a.m. |
| 9660 9662 | Gordon N. Ball, Inc. (GNB) | 4463 | The Reorganized Debtors have reached a settlement of this Claim in principle and Claimant is reviewing the proposed settlement agreement. If the Reorganized Debtors do not have a fully executed agreement in advance of the Hearing, the Reorganized Debtors request that it be continued to May 11, 2021 at 10:00 a.m. |
| Forty-Ninth Omnibus Objection | | | |
| Informal | Kevin Rivera | 86915 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Ninth Omnibus Objection. |
| Fifty-Second Omnibus Objection | | | |
| Informal | Cuyama Solar, LLC | 64176 | The Fifty-Second Omnibus Objection is WITHDRAWN with respect to this Claim. |
| Fifty-Third Omnibus Objection | | | |
| 10238 | Yurok Tribe | 55953 | The previously entered Order disallowing and expunging this Claim has been set aside, and the Claim will be allowed as filed. <i>See</i> Docket No. 10560. |
| Sixty-Third Omnibus Objection | | | |
| 10467 | Yetem Nicodimos | 87107 | The Sixty-Third Omnibus Objection is WITHDRAWN with respect to this Claim. It will be allowed as filed. |
| Sixty-Sixth Omnibus Objection | | | |
| Informal | Amir Shahmirza | 2090 | The Sixty-Sixth Omnibus Objection is WITHDRAWN with respect to this Claim. The Reorganized Debtors will seek to resolve the Claim through the Court-approved ADR procedures, without prejudice to the Reorganized Debtors' right to file future objections to the Claim. |

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1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors

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By: /s/ Dara L. Silveira
Dara L. Silveira

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